

August 29, 2022

VIA ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570 (GBD) (SN)
Havlish, et al. v. Bin Laden, et al., No. 03-cv-9848 (GBD) (SN)
John Does 1 through 7 v. the Taliban, et al., No. 20-mc-740 (GBD) (SN)
Federal Insurance Co., et al. v. al Qaida, et al., No. 03-cv-6978 (GBD) (SN)
Smith v. the Islamic Republic of Iraq, No. 01-cv-10132 (GBD) (SN)
Request for Extension of Time to File Objections to Report and Recommendation

Dear Judge Daniels,

On behalf of Judgment Creditors Fiona Havlish, *et al.* (the “Havlish Creditors”), Judgment Creditors John Does 1 through 7 (the “Doe Creditors”), Judgment Creditors Federal Insurance Co., *et al.* (the “Federal Insurance Creditors”), and Judgment Creditors Estate of Smith, *et al.* (the “Smith Creditors”)—collectively, the “Joint Judgment Creditors”—we submit this letter to request a thirty-day extension of the deadline to file objections to Magistrate Judge Netburn’s August 26, 2022 Report and Recommendation (“Report”), Dkt. 8463, which recommended the denial of our clients’ turnover motions (Dkts. 7763, 7767, 7936; *Smith* Dkt. 62). Judge Netburn directed the Joint Judgment Creditors to address this request to Your Honor. Report at 43.

The Joint Judgment Creditors are working together to coordinate their objections to the Report, and will inform the Court in short order whether they propose to file separate objections or a single, consolidated brief. Given the need to coordinate legal positions across several groups of judgment creditors, as well as the significant issues in this litigation, the Joint Judgment Creditors request a thirty-day extension of the fourteen-day deadline pursuant to Fed. R. Civ. P. 72(b)(2). Currently, objections to the Report are due September 9, 2022. The Joint Judgment Creditors propose that the deadline be extended to October 11, 2022.

This is the Joint Judgment Creditors’ first request for an extension of this deadline. We thank the Court for its consideration of this request.

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Respectfully submitted,

/s/ Lee Wolosky

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cc: All counsel of record (by ECF)